San Francisco Bay Mercury TMDL

Mercury Watershed Council July 2, 2003

California Regional Water Quality Control Board
San Francisco Bay Region



A little history



- 1990 Mercury mines gain attention
- > 1994 OEHHA fish advisory
- > 1998 Preliminary report on Hg in North Bay
- > 2000 Preliminary TMDL report
- > 2002 CEQA scoping meeting

Next Steps

- Informal comments due: Monday, July 14
- Preparation of draft Basin Plan Amendment and supporting Staff Report
 - Scientific peer review
 - Formal public comment and responses
- Regional Board consideration: Fall 2003
- State Board consideration
- U.S. EPA consideration

Establishing the TMDL

	Regulatory element?	Include in Basin Plan?	
Problem Statement	No	For context only	
Numeric targets	Yes	Yes	
Source Analysis	s No	If needed for context	
Linkage Analys	is No	If needed for context	
TMDL Allocation	n Yes	Yes	
Implementation Plan	Yes Mercury Council July 2, 2003	Yes	

San Francisco Bay Does Not Fully Support Its Beneficial Uses

- Sport Fishing
 - Fish consumption advisory
- Wildlife Habitat
 - Mercury in bird eggs accounts for hatch failures
- Preservation of Rare and Endangered Species
 - e.g., California Clapper Rail



Striped Bass



California Clapper Rail

Targets Will Become Regulatory Provisions of Basin Plan

- Fish tissue target
 - 0.2 ppm mercury
 - Relates to human health
- Bird egg target
 - 0.5 ppm mercury
 - Relates to wildlife and rare and endangered species
- Sediment target
 - 0.2 ppm mercury in sediment
 - Derived from the other targets

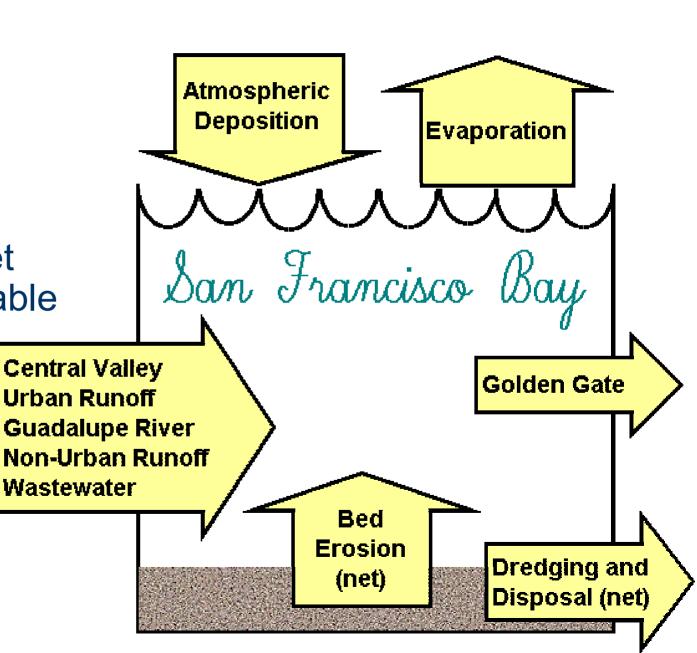
~50%
Reduction
Needed

Think Inside the Box....

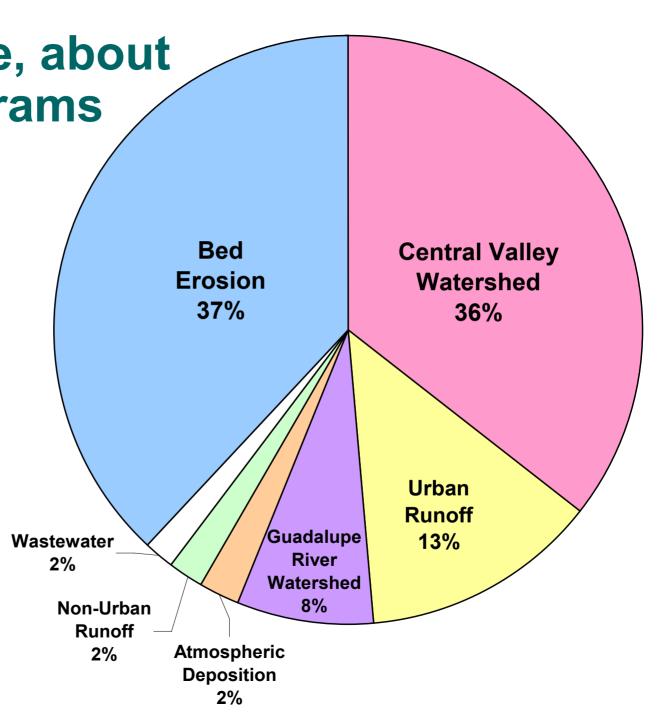
 Identify and prioritize reasonable solutions

Do not over-interpret limited available

data



On Average, about 1,200 kilograms of mercury enter San Francisco Bay each year.



Mercury Loads

Relate to Mercury	cury Concentrations			
	Mercury Load = (kg/yr)		Sediment Hg Conc. (ppm)	
SOURCES				
Bed Erosion	460	1,100	0.42	
Central Valley Watershed	440	1,650	0.26	
Urban Runoff	160	410	0.38	
Guadalupe River Watershed	92	NA	2.07	

27

25

19

1,220

150

190

1,400

1,730

NA

400

NA

3,570

400

NA

3,170

3,570

NA

0.06

NA

0.37

NA

0.44

Atmospheric Deposition

Dredging and Disposal (net)

Transport through Golden Gate

Non-Urban Runoff

Wastewater

Evaporation

TOTAL

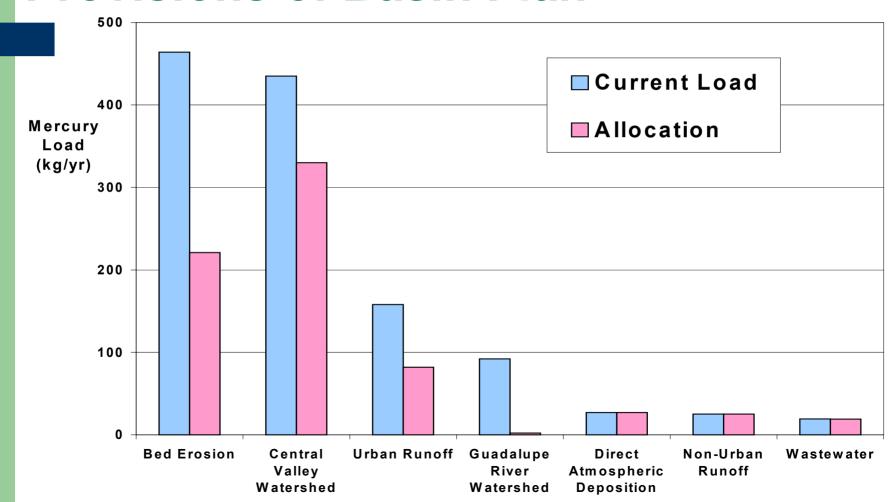
LOSSES

TOTAL

Allocations Reflect Sediment Target

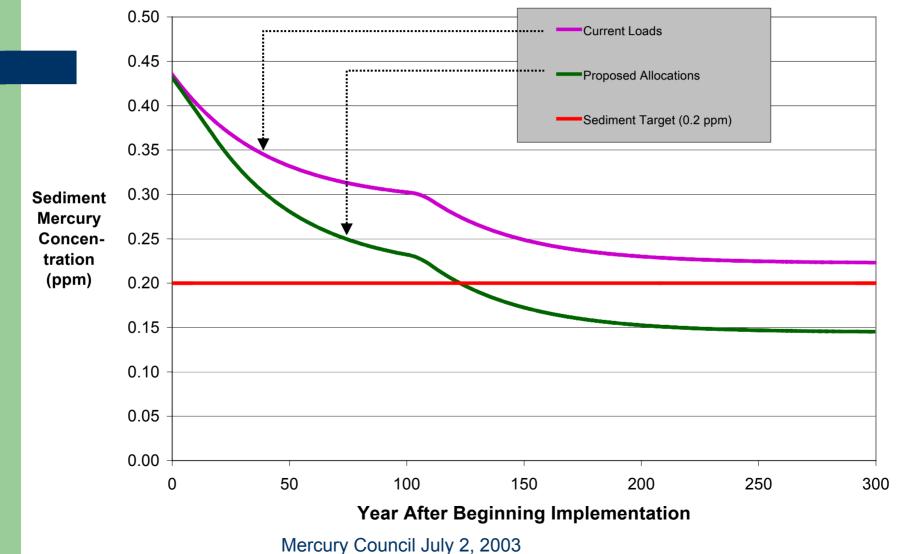
	Mercury Load =	Sediment	Sediment
	(kg/yr)	Load (M kg/yr)	Hg Conc. (ppm)
SOURCES			
Bed Erosion	220	1,100	0.2
Central Valley Watershed	330	1,650	0.2
Urban Runoff	82	410	0.2
Guadalupe River Watershed	2	NA	0.2
Atmospheric Deposition	27	NA	NA
Non-Urban Runoff	25	400	0.06
Wastewater	19	NA	NA
TOTAL	1,220	3,570	
LOSSES			
Dredging and Disposal (net)	150	400	0.37
Evaporation	190	NA	NA
Transport through Golden Gate	1,400	3,170	0.44
TOTAL	1,730	3,570	

Allocations Will Become Regulatory Provisions of Basin Plan



Mercury Council July 2, 2003

Expect Significant Improvement



Implementation Plan has 4 Goals



- 1. Reduce mercury loads to SF Bay.
- 2. Reduce production of methyl mercury.
- 3. Monitor and investigate bay system.
- 4. Encourage actions that address multiple contaminants.



- Urban Stormwater Runoff
 - Demonstrate load reductions via source control.
- Municipal and Industrial Wastewater
 - Maintain good current performance.
 - Control sources and do pollution prevention.
- Industrial Wastewater
 - Maintain good current performance.
 - Control sources and do pollution prevention.



- Non-Urban Stormwater Runoff
 - No actions planned (sediments below target).
- Dredging and Disposal
 - Expect LTMS implementation.
 - Investigate impact of dredging on mercury uptake and compliance with permits already in effect.
- Direct Atmospheric Deposition
 - Investigate relevance and controllability.
 - Support and track national and international efforts.



- Bay Margin Contaminated Sites
 - Quantify mercury on-site and loading to Bay.
 - Quantify impacts relevant to TMDL targets.
- Wetlands
 - Investigate wetland role in mercury cycling.
 - Manage wetlands to minimize methylation.



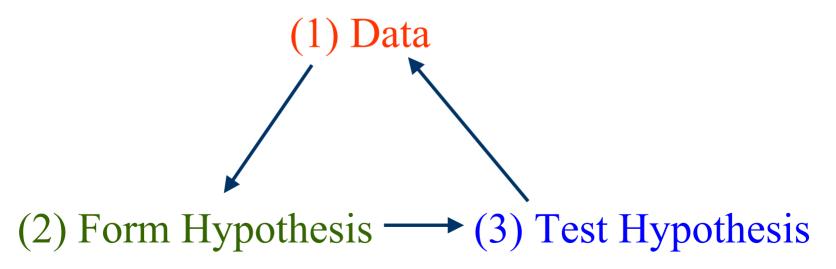
- Abandoned Mercury Mines
 - Bring local mines into compliance with Basin Plan conditions.
- Central Valley Watershed
 - Develop and implement Bay TMDLs in Central Valley region.
- Guadalupe River Watershed
 - Develop and implement Guadalupe River TMDL.

Adaptive Implementation = Using The Scientific Method

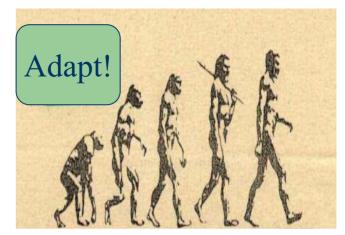


From National Academy of Science Report

"...ultimate way to improve the scientific foundation of the TMDL program is to incorporate the *scientific method*"

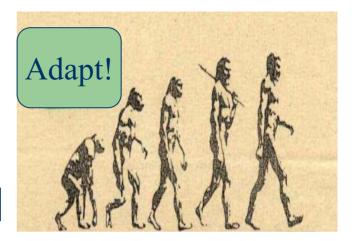


Adaptive Implementation



- State hypotheses and rationale
- Monitor to assess progress
 - toward targets and allocations.
- Special studies to assess:
 - Appropriateness of targets; and
 - Controllability of loads and methylation.
- Re-visit decisions on targets, allocations, and implementation actions every 5 years.
- Form new hypotheses. Lather, rinse, repeat.

We will be adaptable



During the 5 year review, we will ask:

- Is bay making progress toward targets?
- Should we modify monitoring?
- What are loads and how have they changed?
- Is there new information that suggests modifications to targets, allocations, or actions.

Comment Now – Big Changes Become Harder and Harder to Make

- Focus on regulatory provisions
- Be substantive TMDL must be based on evidence in administrative record
- Suggest feasible revisions or solutions
- Recognize that TMDL must move forward



www.swrcb.ca.gov/rwqcb2/sfbaymercurytmdl.htm

What Do You Think?



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Comments
Due July 14